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Director, Emergency and Remedial Response Division
United States Environmental Protection Agency Region 2
290 Broadway, 19th Floor
New York, New York 10007

New Jersey Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency Region 2
290 Broadway, 17th Floor
New York, New York 10007
Attention: Attorney for Pohatcong Site

United States Environmental Protection Agency, Region 2
2890 Woodbridge Avenue
Building 209 (MS-211)
Edison, New Jersey 08837
Attention: Washington Plant, Pohatcong Site On-Scene Coordinator

Fred Mumford
New Jersey Department of Environmental Protection
380 Scotch Road
West Trenton, New Jersey 08628
(via electronic mail only)

Re: Monthly Progress Report No. 34
Reporting Period December 1, 2017 to December 31, 2017
2014 Vapor Intrusion Removal Action at the Washington Facility
Pohatcong Valley Groundwater Contamination Superfund Site
Warren County, New Jersey

January 10, 2017

Ramboll Environ
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Dear Pohatcong Consent Decree Notice Recipients:

On behalf of Pechiney Plastics Packaging, Inc. (PPPI), the Primary Settling Defendant for the Remedial Design/Remedial Action Consent Decree (CD)¹, Ramboll Environ US Corporation (Ramboll Environ) submits this monthly progress report in compliance with Section X, Paragraph 30 of the CD and Appendix B-3 to the CD, Statement of Work for the 2014 Vapor Intrusion Removal Action at the Washington Facility (2014 VI Removal Action SOW) at the Pohatcong Valley Groundwater Contamination Superfund (PVGCS) Site. This report provides a description of the actions and activities undertaken pursuant to the CD and related to the 2014 VI Removal Action SOW during this reporting period and plans, actions and data scheduled in the next 8 weeks.

¹ In the matter of United States of America v. PPPI (Civil Action No. 09-cv-05692) and United States of America v. Bristol Myers Squibb Company, et. al. (Civil Action No. 14-cv-05798) effective March 11, 2015.

Actions Taken Toward Compliance with Consent Decree

The following activities were performed during this reporting period:

- The long-term soil vapor extraction (SVE) system and east wall sub-slab depressurization system (SSDS) continued operation during this reporting period. The SVE system is currently operating at an overall vacuum of 7 inches Hg with an average inlet flow rate of approximately 440 cubic feet per minute (CFM).
- During this period the 500 CFM SVE system operated more than 89% of the time (i.e., a total of 661 hours over 31 days) and the east wall SSDS operated 100% of the time.
- The Monthly Progress Report No. 33 for the VI Removal Action at the Washington facility reporting November 2017 activities was submitted to the USEPA in a letter dated December 8, 2017.
- Ramboll Environ collected sub-slab vapor monitoring port vacuum and photoionization detector (PID) measurements on December 21, 2017. These measurements and the SVE blower runtime for the December 2017 reporting period are included in the summary table in Attachment 1.

Routine OM&M Events:

The following routine OM&M events were conducted during this reporting period:

- None during this period.

Problems Encountered, Actions Taken and Their Resolutions

The following problems were encountered during this reporting period:

- An unplanned shutdown of the system was identified to have occurred sometime during the weekend of December 29 to December 31, 2017. Operators responded the morning of Tuesday, January 2, 2017, verified that the West Wall SSDS system was running, and inspected the system. The registered fault was with the variable frequency drive (VFD) for heat exchanger (at the discharge of the blower). The expected cause of the VFD fault was a fluctuation in electrical power services to the system. After clearing the alarm indication and reset the VFD, operators re-started the main SVE blower and placed the West Wall SSDS back in stand-by. The delay in identification of the shutdown was a fault with the modem for the SVE system that provides automatic alerts to off-site operators. Reset of the modem returned it to proper operation. As of the date of this progress report, the system continues to run without issue.

Analytical Results and Data Received During the Reporting Period

The following analytical data were received during this reporting period:

- None during this period.

Anticipated Plans, Actions and Data Scheduled (during the next 8 weeks)

The following activities are planned for the next 8 weeks:

- One round of measurements of the SVE system and SSDS is planned to be performed in January 2018.

Delays Encountered or Anticipated, and Efforts Taken to Mitigate

The following delays were encountered during this reporting period:

- None during this reporting period.

Closing

Pursuant to Section X, Paragraph.30 of the CD, three hard copies of this monthly progress report have been submitted to the designated recipients. If you have any questions or comments regarding this monthly progress report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce S. Kennington".

Bruce Kennington
Project Coordinator

D 312.288.3834
M 312.953.9965
bbennington@ramboll.com

Attachment:
SVE/SSDS Measurements, December 21, 2017

cc: *Via Electronic Mail*
Michelle Grainger – USEPA, Region 2
Roy Duckett – Rio Tinto
Lauren Piana – Rio Tinto
Bruce White – Barnes & Thornburg LLP

ATTACHMENT 1

SVE/SSDS Measurements

December 21, 2017

SVE/SSDS Measurements, December 21, 2017
Vapor Intrusion Response Activities
Albéa Americas, Washington Facility
191 Route 31 North, Washington, Warren County, New Jersey

Sub Slab Measurement Location	PID (ppm)	Vacuum (inches of water)
¹ CDM-SS-01	---	---
CDM-SS-02N	1.740	-3.149
CDM-SS-02S	1.904	-3.099
CDM-SS-03	1.674	-0.192
CDM-SS-04	1.741	-0.034
CDM-SS-05	3.464	-0.005
CDM-SS-06	3.462	-0.012
CDM-SS-07	1.744	-0.099
¹ CDM-SS-08	---	---
¹ CDM-SS-09	---	---
CDM-SS-10	0.307	-0.001
EPA-SS-11	1.205	-0.030
EPA-SS-12	2.710	-1.012
¹ EPA-SS-13	---	---
EPA-SS-14	0.102	-0.001
¹ EPA-SS-15	---	---
EPA-SS-16	0.907	-0.026
EPA-SS-17	0.765	-0.089
EPA-SS-18	0.775	-0.080
EPA-SS-19	1.407	-0.045
EPA-SS-20	1.747	-0.009
EPA-SS-21	2.334	-0.845
EPA-SS-22	5.038	-0.939
¹ EPA-SS-23	---	---
EPA-SS-24	2.238	-0.273
EPA-SS-25	0.743	-0.001
¹ EPA-SS-26	---	---
EPA-SS-27	4.831	-0.399
EPA-SS-28	2.306	-0.062
EPA-SS-29	2.586	-0.255
EPA-SS-30	4.170	-1.945
EPA-SS-31	2.571	-0.883
EPA-SS-32	1.895	-0.553
VP-2	3.923	-2.090
VP-3	2.180	-0.244
¹ VP-7	---	---
VP-10	3.340	-0.142
VP-11	2.705	-0.002
VP-12	2.600	-0.172
VP-13	2.447	-0.009
VP-14	3.979	-0.154
¹ VP-15	---	---
VP-16	3.757	-0.275

SVE/SSDS Measurement Location	PID (ppm)	Vacuum (inches of water)
SSDS-01	1.845	-28
SSDS-02	2.974	-38
SSDS-03	5.370	-12
SSDS-04	4.554	-40
SSDS-05	1.270	-5
² SSDS-06	---	---
² SSDS-07	---	---
² SSDS-08	---	---
² SSDS-09	---	---
² SSDS-10	---	---
SVE-1	3.590	-80
SVE-2	1.930	-77
SVE-3	0.838	-87
SVE-4	0.938	-82
SVE-5	0.115	-80
SVE-6	0.703	-86
SVE-7	5.214	-82
SVE-8	2.647	-66
SVE-9	2.970	-77
SVE-10	1.792	-80
SVE-11	0.984	-78
SVE-12	3.920	-78
SVE-13P	6.503	-50
SVE-14P	5.376	-80
SVE-15P	3.015	-10
SVE-16P	3.250	-20

Vapor Phase GAC Measurements		
Location	PID (ppm)	Pressure (in. of water)
VGAC1 IN	1.7	---
VGAC1 OUT	1.1	---
VGAC2 OUT	0.4	---

Summary of SVE Blower Runtime for Reporting Period	
Hour Meter at end of Previous Reporting Period (Hours)	29,154
Hour Meter at end of Current Period (12/31/2017) (Hours)	29,815
Total SVE Blower Runtime for Reporting Period (Hours)	661

Notes:

- ¹ Vapor monitoring point not accessible; no measurement collected.
- ² Locations SSDS-06 through SSDS-10 (West Wall) are for standby use only and were not operational at the time of measurement.